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July 14, 2025

VIA ECF:

Hon. Sanket J. Bulsara, U.S.D.J.
United States District Court, E.D.N.Y.
100 Federal Plaza Courtroom
930 Central Islip, NY 11722

Re: AA Medical, P.C. v. Iron Workers Local 40, 361 & 417 Health Fund, EDNY Docket
No. 2:22-cv-01249-ENV-LGD

Dear Judge Bulsara:

This firm represents Defendant Iron Workers Local 40, 361 & 471 Health Fund and respectfully moves to request a brief adjournment of the briefing schedule for the motion for summary judgment currently pending in the above-captioned matter. Counsel for Plaintiff AA Medical, P.C., has consented to the request. The current schedule calls for Plaintiff's opposition brief to be filed by June 27, 2025, and Defendant's reply brief to be filed by July 18, 2025. This request is made pursuant to Local Civil Rule 7.1(e) and in accordance with Your Honor's Individual Practices. This is Defendant's first request for an adjournment of the briefing schedule on this motion. Plaintiff's prior request for an adjournment was granted.

My office did not receive a copy of Plaintiff's opposition until July 9, 2025, when Plaintiff's counsel emailed me a copy of the papers. I emailed Plaintiff's counsel on July 1st and July 7th to ask

for the status of the papers. Mr. Teresh subsequently provided a copy of his papers via email on July 9th. The additional time requested will allow for a perfected response.

Defendant respectfully requests a 21-day extension to the current briefing schedule, as follows:

- Defendant's reply papers to be served by August 8, 2025.

Defendant further notes that opposing counsel has graciously agreed to this request for an extension.

Defendant submits this request in compliance with Local Civil Rule 7.1(e) and Your Honor's Individual Practices and apologizes for any inconvenience this may cause. Defendant appreciates the Court's understanding in this matter.

Thank you for your attention to this request. Please do not hesitate to contact me should you require any further information.

Yours truly,

COLLERAN, O'HARA & MILLS LLP

By: /s/ Thomas P. Keane